

From: Kozen, Geoffrey H. GKozen@RobinsKaplan.com

Subject: RE: Re: [EXTERNAL] Lozada-Leoni

Date: June 21, 2020 at 6:23 PM

To: Julie Kristi Jones jk@hsjustice.com, Barcus, John M. john.barcus@ogletree.com, Eisenstat, Gary D. gary.eisenstat@ogletreedeakins.com, ddoan@haltomdoan.com, rroeser@haltomdoan.com

Cc: Susan Hutchison hutch@hsjustice.com, Rafe Foreman srforeman@hsjustice.com, MacKenzie Long Mlong@hsjustice.com

GK

Counsel,

Ms. Johnson informed me this afternoon that someone she was recently in contact with has tested positive for COVID-19. As a result, she will be under quarantine for 14 days. Because I will not be able to effectively prepare her for her deposition or defend her deposition while remote from her, I request that you agree to postpone her deposition for at least 14 days. Ms. Johnson schedule in early July is very flexible, and so I am confident we will be able to find an alternative date.

Thank you. I appreciate your flexibility in this difficult time.

Best,
Geoff Kozen

Geoffrey Kozen
612 349 0827

From: Julie Kristi Jones <jk@hsjustice.com>

Sent: Friday, June 5, 2020 3:35 PM

To: Barcus, John M. <john.barcus@ogletree.com>; Eisenstat, Gary D.

<gary.eisenstat@ogletreedeakins.com>; ddoan@haltomdoan.com; rroeser@haltomdoan.com

Cc: Susan Hutchison <hutch@hsjustice.com>; Rafe Foreman <srforeman@hsjustice.com>;

MacKenzie Long <Mlong@hsjustice.com>; Kozen, Geoffrey H. <GKozen@RobinsKaplan.com>

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Thank you in advance for your cooperation.

Robins Kaplan LLP

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